

EXHIBIT B

Affidavit of Keith Ingram

In Texas v. Holder

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF TEXAS)
c/o Attorney General Greg Abbott)

Plaintiff,

Case No. 1:12-CV-00128

vs.

ERIC H. HOLDER, JR.,)
Attorney General of the United States,)

(RMC, DST, RLW)
Three-Judge Court

Defendant.

AFFIDAVIT OF KEITH INGRAM

STATE OF TEXAS §
COUNTY OF TRAVIS §

BEFORE ME, the undersigned authority, on this day personally appeared Keith Ingram, who, being by me duly sworn, deposed and stated as follows:

“I, the undersigned, am over 21 years of age, of sound mind, capable of making this affidavit, and have personal knowledge of the facts herein stated as being true and correct:

1. My name is Keith Ingram. I currently serve as the Director of Elections for the Texas Secretary of State, and I have been a licensed attorney since 1993. The Secretary of State, as the chief election officer for the State of Texas, has authority to obtain information and

maintain uniformity in the application, operation, and interpretation of the Election Code and of the election laws outside the Election Code. TEX. ELEC. CODE ANN. § 31.003 (Vernon 2010).

2. Federal approval of Senate Bill 14, enacted by the 82nd Legislature, is pending before the court in the above-styled cause.

3. In order for Texas to implement Senate Bill 14 for the November General Election, there are three factors to consider:

- Production and distribution of supplies for all of the November 2012 General and local elections currently scheduled;
- Re-production of Election Judge's and Clerk's 2012-2013 Training Materials; and
- Voter Education regarding new photo identification laws throughout the state of Texas.

4. In our communications with vendors in the election supply business, they would like to have the forms approved by the Secretary of State's office by early June, with a mass production of the forms in late June and during the month of July. The vendor who supplies the majority of the forms to the State of Texas entities told us that this timeline would be necessary in order to have the current forms to the counties and other local entities in time to conduct their local training classes and be ready to conduct early voting and election day voting for the November 6, 2012 elections. There are a handful of forms that would need to change in order to comply with SB-14 requirements. For example, the provisional ballot is a form that would need to be modified depending upon the outcome of this case. Those modified forms can be printed and supplied to the entities holding elections in a supplemental election worker kit if there is a decision as late as August 15, 2012. The vendor prefers a decision by August 1, but the absolute drop dead date is August 15.

5. With respect to the new training materials, the Secretary of State's office plans to proceed with drafting the materials and distributing to the counties and local entities. In order to

get the materials to the counties and local entities for the November early voting period, we would need to have everything distributed by August of 2012.

6. With respect to voter education, the Secretary of State, along with its advertising vendors, Burson-Marsteller and TKO, will have different ads, commercials and radio spots to educate the general public about the November 2012 Elections, which we will alter if Senate Bill 14 is pre-cleared. We have a road tour scheduled to begin in August of 2012 for the November 6, 2012 elections. We anticipate that paid advertising for the general election education program would start running in the August/September timeframe. The Secretary of State and its advertising vendors have already begun preparations for its voter education efforts in both the primary and general elections. While logistics of the program would likely not change significantly, the content of the efforts would change focus to educate voters on how they can comply with the requirements of Senate Bill 14.

7. In order to have a basic education program in place to have a successful November 2012 election season, the Secretary of State's office would need to have a final decision by August 15, 2012; however, to have a complete program that would mirror what our Texas voters, counties and local entities have become accustomed to, we would need to have a final decision no later than July 6.

Further Affiant Sayeth Not.



SIGNATURE

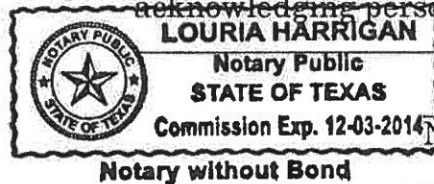
Keith Ingram

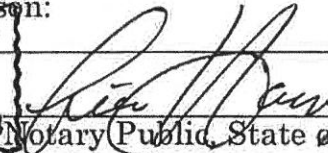
PRINTED NAME

SWORN TO AND SUBSCRIBED before me on the 22nd day of March, 2012.

[Check one:]

- ☒ personally known to me;
☐ proved to me on the oath of who is a credible witness personally known to me; or
☐ proved to me through the following current identification card or other document issued by the federal government or any state government containing the photograph and signature of the acknowledging person:





Notary Public, State of Texas

Notary Seal: _____

My Commission expires: _____